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Li sa_Yel eni ck@mhhs. org
Sent: Friday, February 25, 2005 1:05 PM
To: Torres, Francine
Subject: USDA organi c products

Attachments: ATTACHMENT. TXT

Ms. Torres,

As a buyer of organic products I expect certain things to be factual. This includes things like no use of pesticides, grass-fed animals that are not confined to pens, animals that are fed healthy diets, etc.

You may already be aware of an article written by the Chicago Tribune, to borrow, that said:

A reporter recently wrote about how one producer, Aurora Organic Dairy, has cows on drylots instead of pasture. The operation, based outside Denver, has more than 5,000 cows confined to pens. When Aurora's president and chief organic officer was questioned about the lack of pasture access, he apparently responded by saying he wants to make organic milk more affordable for American consumers.

Certain companies appear to be interpreting this "temporary" clause as permission for permanent confinement, so that the animals spend most of their lives indoors or on drylots, areas which are devoid of vegetation.

I do not want farmers to interpret laws or twist them so that they can mean a number of things. I want to trust that the items I purchase to eat are indeed organic by its real definition and not something different based on location or owner.

What does the organic label mean to you?

I urge you to answer this and apply higher, more detailed standards to the U.S. Department of Agriculture's National Organic Program regulations—a list of policies that producers must follow to have the USDA Certified Organic Label on their products.

The rule clearly states under Livestock Living Conditions that ruminants must have "access to pasture..." Ruminants are animals such as cattle, sheep, and goats. However, the rule has a caveat allowing "temporary" confinement of ruminants for a variety of reasons, such as bad weather or to prevent the spread of disease.

Economics and the organic label are two different things. Consumers have repeatedly shown, I am one of them, they will pay more for organic products, and clearly good animal husbandry skills, including access to pasture, are part of consumers' organic expectations. What's more, any shift toward the corporate model of agriculture will only perpetuate the industrialization of what once was a niche organic market with benefits for small, family farmers and animals; this shift does a disservice to the pioneers and advocates of the organic movement. Consumers who assume they are buying a superior product because it is labeled 'organic' will be fooled into supporting in an agricultural scheme that is one step away from a CAFO.

To summarize my position, I strongly support the pasture requirements for organic production as recommended by the National Organic Standards Board on February 1, 2005. The health and welfare of the animals raised for human consumption is important – especially to the organic process and label. The USDA should realize this and push for stronger, better defined policy regarding the organic label.

Sincerely,
Li sa K. Yel eni ck

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